

KRONENBERGER BURGOYNE, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
www.KBInternetLaw.com

KRONENBERGER BURGOYNE, LLP
Karl S. Kronenberger (Bar No. 226112)
Jeffrey M. Rosenfeld (Bar No. 222187)
150 Post Street, Suite 520
San Francisco, CA 94108
Telephone: (415) 955-1155
Facsimile: (415) 955-1158
karl@KBInternetLaw.com
jeff@KBInternetLaw.com

Attorneys for Defendant and
Cross-Plaintiff MIKHAIL FIKS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CASE NO. 3:08-cv-02474-BZ

LIMO HOSTING, INC., et al.,

Plaintiffs,
v.

MIKHAIL FIKS, et al.,

Defendants.

**JOINT STIPULATION FOR
EQUITABLE RELIEF PURSUANT TO
VERDICT AND ~~[PROPOSED]~~ ORDER**

MIKHAIL FIKS,

Cross-Plaintiff,
v.

LIMO HOSTING, INC., et al.,

Cross-Defendants.

1 The parties to the above-captioned action, by and through their attorneys of
2 record, hereby stipulate as follows:

3 WHEREAS, Special Verdict was entered in favor of Defendant and Cross-Plaintiff
4 Mikhail Fiks ("Fiks") and against Plaintiffs Limo Hosting, Inc. and Oleg Gridnev
5 (collectively, "Plaintiffs") on October 5, 2009;

6 WHEREAS, the jury, as reflected in the Special Verdict, found that Plaintiffs
7 violated the Anticybersquatting Consumer Protection Act regarding the domain names,
8 <FreeLimoWebsite.net>, <FreeLimoWebsite.org>, <FreeLimoWebsites.net>, and
9 <FreeLimoWebsites.org>;

10 WHEREAS, the jury, as reflected in the Special Verdict, found that Plaintiffs had
11 violated the Bane Act (Civ. Code § 52.1);

12 NOW THEREFORE, THE PARTIES AGREE AND STIPULATE that the Court
13 should order the following injunctive relief consistent with the Special Verdict:

- 14
15 1. To the extent that Plaintiffs or Plaintiffs' agents/affiliates control
16 <FreeLimoWebsite.net>, <FreeLimoWebsite.org>, <FreeLimoWebsites.net>,
17 <FreeLimoWebsites.org>, <LimoDeals.net> and <LimoDeals.org>, Plaintiffs shall
18 transfer such domain names to Fiks; furthermore, Plaintiffs will not interfere with
19 the transfer of such domain names to Fiks;
- 20 2. That Plaintiffs and Plaintiffs' agents/affiliates shall not contact, including by
21 telephonic or electronic means, Fiks and/or Fiks' family;
- 22 3. That Plaintiffs and Plaintiffs' agents/affiliates shall not contact Fiks' business
23 customers; *provided, however*, that Plaintiffs or Plaintiffs' agents/affiliates may
24 contact a Fiks business customer concerning a *bona fide* debt owed by such
25 business customer to Plaintiffs;
- 26 4. That Plaintiffs and Plaintiffs' agents/affiliates shall not make any Internet postings
27 referencing Fiks, Fiks' family or Fiks' business;

28 //

1 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD:**

2
3 DATED: October 23, 2009

DATED: October 23, 2009

4 KRONENBERGER BURGOYNE, LLP

LAW OFFICES OF TIMOTHY WALTON

5
6 By: s/ Karl S. Kronenberger

By: s/Timothy J. Walton

7 Karl S. Kronenberger

Timothy J. Walton

8
9 Attorneys for Defendant and
Cross-Plaintiff MIKHAIL FIKS

Attorneys for Plaintiffs and Cross-
Defendants Limo Hosting, Inc. and Oleg
Gridnev

10
11 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

12
13 DATED: October 26, 2009



14
15 The Hon. Bernard Zimmerman
16 UNITED STATES MAGISTRATE JUDGE

KRONENBERGER BURGOYNE, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
www.kbInternetLaw.com